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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ARNOLD KREEK, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiffs,

vs.

WELLS FARGO & COMPANY, WELLS
FARGO FUNDS MANAGEMENT, LLC,
WELLS FARGO FUNDS TRUST, WELLS
FARGO DISTRIBUTORS, STEPHENS, INC.,
WELLS FARGO BANK, N.A.,

Defendants.

Case No. CV 08-1830 JSW

**STIPULATION AND
[PROPOSED] ORDER TO RELATE
CASES AND TRANSFER TO
HON. WILLIAM H. ALSUP**

RONALD SIEMERS, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiffs,

vs.

WELLS FARGO & COMPANY, H.D. VEST
INVESTMENT SERVICES, LLC, WELLS
FARGO INVESTMENTS, LLC, WELLS
FARGO FUNDS MANAGEMENT, LLC,
WELLS CAPITAL MANAGEMENT, INC.,
STEPHENS, INC., WELLS FARGO FUNDS
DISTRIBUTOR, LLC, AND WELLS FARGO
FUNDS TRUST,

Defendants.

Case No. CV 05-04518 WHA

1 WHEREAS, the matter of *Siemers v. Wells Fargo & Co., et al.*, Case No. CV 05-04518
2 WHA (“Siemers action”) has been pending before the Hon. William Alsup since November 4, 2005;

3 WHEREAS, the matter of *Kreek v. Wells Fargo & Co., et al.*, Case no. CV 08-01830 JSW
4 (“Kreek action”) was filed on April 4, 2008 and is currently pending before the Hon. Jeffrey White;

5 WHEREAS, the *Siemers* and *Kreek* matters involve the same core set of facts and name
6 several of the same defendants;

7 WHEREAS, counsel for Defendants and Plaintiffs have met and conferred and agree that
8 the *Siemers* and *Kreek* matters should be related.

9 Pursuant to Civil Local Rule 7-11, Plaintiffs and Defendants, by their undersigned counsel,
10 hereby stipulate that the *Siemers* and *Kreek* matters are related and that the Kreek matter should be
11 transferred to the Hon. Judge William H. Alsup.

12 STIPULATED TO BY:

13 /s/ Michael R Reese
14 Michael R. Reese
15 **REESE RICHMAN LLP**
16 230 Park Avenue, 10th Floor
New York, New York 10169

17 *Counsel for Plaintiffs*

/s/ Jeremy T. Kamras
Jeremy T. Kamras
HOWARD RICE NEMEROVSKI
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Three Embarcadero Center, Seventh Floor
San Francisco, California 94111

*Counsel for Defendants Wells Fargo & Company,
Wells Fargo Funds Management, LLC, Wells Fargo
Funds Trust, Wells Fargo Distributors, Stephens, Inc.,
Wells Fargo Bank, N.A*

20 PURSUANT TO STIPULATION IT IS HEREBY ORDERED:

- 21 1. The matters of *Siemers v. Wells Fargo & Co., et al.*, Case No. CV 05-04518 WHA
22 and *Kreek v. Wells Fargo & Co., et al.*, Case no. CV 08-01830 JSW are hereby
23 deemed as related; and
24 2. The *Kreek* matter is hereby transferred to the Hon. William H. Alsup.

25
26 Dated: April _____, 2008

27 _____
Hon. William H. Alsup
United States District Judge
28

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- and -

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Counsel for Plaintiffs

ARNOLD KREEK, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiffs,

vs.

WELLS FARGO & COMPANY, WELLS
FARGO FUNDS MANAGEMENT, LLC,
WELLS FARGO FUNDS TRUST, WELLS
FARGO DISTRIBUTORS, STEPHENS, INC.,
WELLS FARGO BANK, N.A.,

Defendants.

Case No. CV 08-1830 JSW

**DECLARATION OF MICHAEL R.
REESE REGARDING PERMISSION TO
SIGN STIPULATION PURSUANT TO
GENERAL ORDER 45X(B)**

RONALD SIEMERS, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiffs,

vs.

WELLS FARGO & COMPANY, H.D. VEST
INVESTMENT SERVICES, LLC, WELLS
FARGO INVESTMENTS, LLC, WELLS
FARGO FUNDS MANAGEMENT, LLC,
WELLS CAPITAL MANAGEMENT, INC.,
STEPHENS, INC., WELLS FARGO FUNDS
DISTRIBUTOR, LLC, AND WELLS FARGO
FUNDS TRUST,

Defendants.

Case No. CV 05-04518 WHA

1 I, Michael R. Reese, do hereby declare the following:


2 1. I am a member of the law firm of Reese Richman LLP, counsel for Plaintiff in *Kreek*
3 *v. Well Fargo Co. et al.*, Case No. CV 08-1830 JSW.

4 2. Concurrent with the filing of this Declaration, I filed a stipulation and proposed
5 order to relate the above-captioned matters. On April 14, 2008, I received permission from Jeremy
6 T. Kamras of Howard Rice Nemerovski Canady Falk & Rabkin PC, counsel for defendants in the
7 *Kreek* matter, to sign the stipulation on his behalf.

8 I hereby declare under the penalty of perjury of the United States that the above is true and
9 correct.

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Dated: April 14, 2008



Michael R. Reese